

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK
SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - JUDGE VALERIE E. CAPRONI

*D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
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July 19, 2019

**Jason Goodman, CEO
Multimedia Systems Designs, Inc.
252 7th Avenue, APT #6S
New York, NY 10001-7334**

**CLERK
PRO SE DIVISION, ROOM #200
U.S. District Court for the SDNY
500 Pearl Street
New York, New York 10007-1312**

SUBJECT: PROPOSED DISQUALIFICATION OF PRESIDING JUDGE – PART ONE

REF: (a) ROBERT S. MUELLER, III (former special counsel)
**(b) SWEIGERT V. GOODMAN,
CIVIL CASE #: 1:18-CV-08653-VEC
JUDGE VALERIE E. CAPRONI**

Good Morning:

1. This letter is an attempt to ascertain the intentions of the defendant (Goodman) concerning a motion proposed by the plaintiff (undersigned). The purpose of the proposed motion is to examine the supporting rationale for the proposed disqualification of the current presiding judge.

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2. This may be an advantageous motion for the defendant to support, due to the apparent conflict-of-interest with matters involving the recent indictment of Robert S. Mueller, III, former special counsel (ref: (a)), by your "Citizens Grand Jury" team.

3. The present presiding judge was the General Counsel for the Federal Bureau of Investigation (F.B.I.) between 2003 to 2011. In fact, she was appointed by ref: (a) and most likely worked very close with him over the eight (8) years of her F.B.I. tenure. Please note the following screen-shot:

FBI appointment [edit]

In August 2003, FBI Director Robert F. Mueller named her General Counsel of the FBI.^{[4][1]} Caproni played a leading role in limiting the involvement of FBI officials in interrogations of Guantanamo captives when interrogators from other agencies used "enhanced interrogation techniques".^[5]

On April 14, 2010, after the Judiciary Subcommittee Hearing on the Report by the Office of Inspector General (IG) of the Department of Justice on the FBI's Use of Exigent Letters and Other Informal Requests for Telephone Records, House Judiciary Committee Chair John Conyers, Jr. (D-Mich.)^[6] issued a statement calling upon FBI Director Mueller to take immediate action to punish and fire those in the FBI Office of General Counsel headed by Caproni, who had unlawfully used exigent letters and provided legal advice that was inconsistent with federal law.

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Internet URL: https://en.wikipedia.org/wiki/Valerie_E._Caproni

4. You recently produced a two-part video series to document the "indictment" of ref: (a) by a "Citizens Grand Jury", with Larry Klayman acting as "special prosecutor". See video entitled, "Freedom Watch Citizens Grand Jury – Mueller Indictment Part 1 Introduction & Jury Instructions", dated June 27, 2019.

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Freedom Watch Citizens Grand Jury – Mueller Indictment Part 1
Introduction & Jury Instructions



Jason Goodman

✓ Subscribed 82K

4,969 views

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Streamed live on Jun 27, 2019

Larry Klayman and his dedicated team at Freedom Watch put together this historic Citizens Grand Jury. With this, the people of the United States take back the power bestowed upon us by the founding fathers of this nation. If the Justice Department will not, citizens must hold Robert Mueller accountable for his gross constitutional violations.

L to R: Larry Klayman and Jason Goodman

Streamed live on Jun 27, 2019

Larry Klayman and his dedicated team at Freedom Watch put together this historic Citizens Grand Jury. With this, the people of the United States take back the power bestowed upon us by the founding fathers of this nation. **If the Justice Department will not, citizens must hold Robert Mueller accountable for his gross constitutional violations.** [emphasis added]

Internet URL: https://www.youtube.com/watch?v=Mce9OhkNj_M&t=12s

5. As also produced the second part of this widely distributed video content is entitled, “*Freedom Watch Citizens Grand Jury – Mueller Indictment Part 2 Dr. Jerome Corsi's Witness Testimony*”, dated June 27, 2019.

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Freedom Watch Citizens Grand Jury – Mueller Indictment Part 2 Dr. Jerome Corsi's Witness Testimony



11,280 views

630 36

L to R: Larry Klayman, Jerome Corsi [on monitor], Jason Goodman

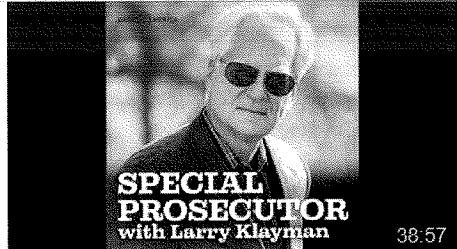
Streamed live on Jun 27, 2019

Part 2 of Freedom Watch's historic Citizens Grand Jury proceedings **includes testimony from Dr. Jerome Corsi. Dr. Corsi was targeted by Mueller's investigation** and subjected to rigorous interrogation as well as subsequent reputation and financial destruction. [emphasis added]

Internet URL: <https://www.youtube.com/watch?v=9vWce9xTOCU&t=4147s>

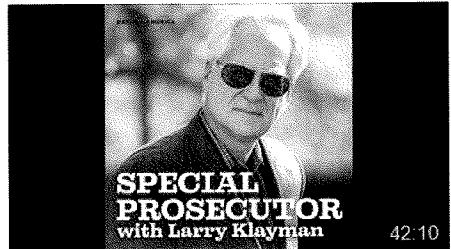
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6. Below are screen-shots of Larry Klayman, esq. appearing as a “special prosecutor”.



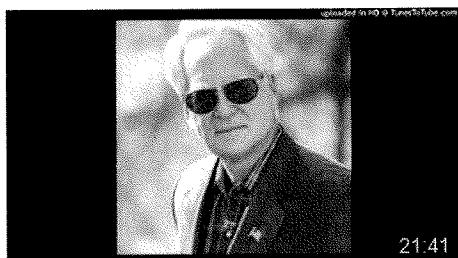
Special Prosecutor with Larry Klayman: Sessions Resignation? McCain Treason? FBI Corruption!

Freedom Watch
1 year ago • 9,398 views
Guest: Dennis Montgomery.



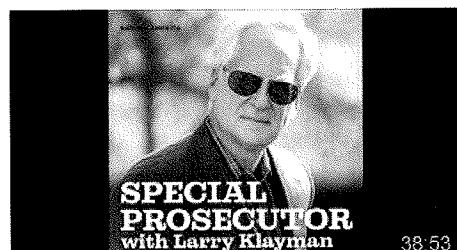
Special Prosecutor with Larry Klayman - Show Premiere

Freedom Watch
2 years ago • 5,451 views
Guests: Government Whistle Blowers & Enemy of The State Writer The first airing of "Special Prosecutor with Larry Klayman" via ...



Special Prosecutor's Larry Klayman Talks with J. Corsi

RadioAmerica TV
7 months ago • 377 views
Jerome Corsi is being asked to lie under oath by the office of special counsel Robert Mueller for the purpose of implicating Roger ...

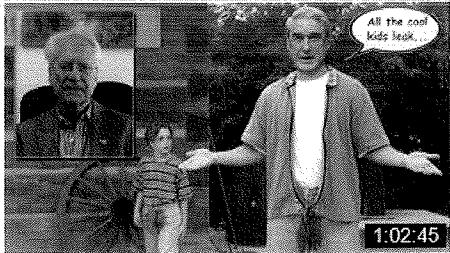


Special Prosecutor with Larry Klayman - Comey, FBI and Surveillance

Freedom Watch
2 years ago • 5,524 views
Guest: Mark J Fitzgibbons of American Target Advertising.

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7. A small sample of other videos you have made with Larry Klayman, esq., (to apparently smear ref: (a)) appear below.



Is Robert Mueller the Miles Davis of Leaking? with Special Guest Larry Klayman

Jason Goodman

Streamed 7 months ago • 12,476 views

More criminal leaks from Robert Mueller's Special Counsel Office. Larry Klayman joins me for a critical update of this week's ...

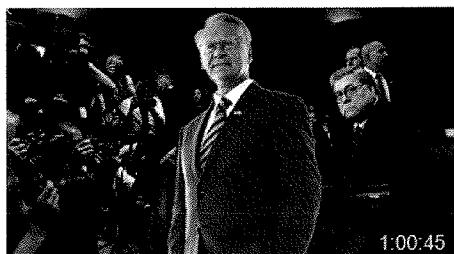


Mueller Orders Most Expensive Nothing Burger Ever with Special Guests Larry Klayman & Kevin...

Jason Goodman

Streamed 2 months ago • 9,190 views

Robert Mueller has served up what may be the most expensive nothing burger the American public has ever seen. Former DOJ ...

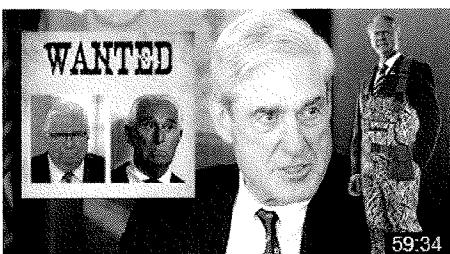


Contemptible Congress and the Never Ending Mueller Probe with Special Guest Larry Klayman

Jason Goodman

Streamed 2 months ago • 5,255 views

Despite strong words, Larry remains convinced Barr's DOJ will do nothing as he analyzes the seemingly unending Congressional ...



Mueller's Most Wanted – Criminalized Prosecution with Special Guest Larry Klayman

Jason Goodman

Streamed 5 months ago • 8,901 views



Klayman v Mueller – Battle of the Special Counsel's Office

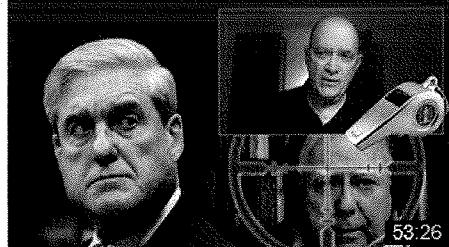
Jason Goodman

1 year ago • 7,930 views

Larry Klayman has initiated a FOIA request that could spell the end of Robert Mueller's conflict fraught Special Counsel investigation. After a positive outcome in today's hearing, Larry join...

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8. You have made an equal number of smear videos of ref: (a) with Jerome Corsi, see below for small sample:

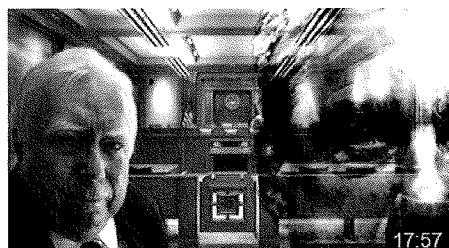


Corsi in the Crosshairs – Bill Binney Blows the Whistle on Robert Mueller and DOJ Corruption

Jason Goodman

Streamed 7 months ago • 81,630 views

Bill Binney is a U.S. Army veteran and was the Lead Technical Director at NSA where he spent more than 30 years. When Binney ...

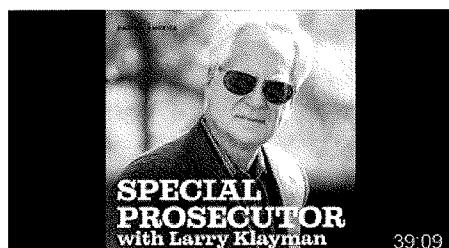


Dr. Corsi's Day in Court – The Only Man in America Taking on Robert Mueller

Jason Goodman

Streamed 6 months ago • 39,700 views

Larry Klayman challenges Robert Mueller's special counsel on behalf of Dr. Jerome Corsi in the opening hearing with Judge Leon ...



5 Jan 2019: Corsi Cases Vs Mueller Move Forward! & Winning the War Vs The Left!

Freedom Watch

6 months ago • 4,957 views

GUEST: Jason Goodman, "CrowdsourceTheTruth"



Corsi v Mueller Legal Analysis with Special Guest Larry Klayman

Jason Goodman

Streamed 6 months ago • 69,815 views

Larry Klayman joins me to discuss yesterday's hearing with judge Richard Leon, the first in Corsi v Mueller. Support Dr. Corsi's ...



Dr. Corsi's Day in Court – Post Press Conference Short Wrap Up

Jason Goodman

6 months ago • 4,659 views

After the January 3, 2019 hearing with Judge Leon in the matter of Corsi v Mueller, Dr. Corsi and his attorney Larry Klayman held a press conference on the courthouse steps. I have a ...

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9. The presiding judge may find it difficult to avoid becoming personally involved in expected psychologically defensive bias with regards to ref: (a), now that your team has indicted ref: (a). The presiding judge may find your very public close associations with Jerome Corsi and Larry Klayman, esq. to be troubling as well. To refresh your memory, both of these men appear on the Southern Poverty Law Center “Watch List” for hate speech.

10. In the case of Mr. Klayman, he has provided evidence and testimony to a federal court that he is in active contact with government officials of Israel. See *Montgomery v. Comey*, U.S.D.C. for the D.D.C., Civil Action No. 17-1074 (RJL), (D.D.C. Mar. 1, 2018). See excerpt of ORDER from the Hon. Richard J. Leon (see below).

Preliminary Injunction, or their supporting affidavits—that they communicate with any persons abroad, let alone that they have reason to believe that their foreign contacts have been targeted under the PRISM program. Plaintiffs’ allegations here are therefore *even less* colorable than those I dismissed for lack of standing under *Clapper* in *Klayman I* and *Klayman II*. See *Klayman*, 2017 WL 563668, at *13 (holding that Klayman failed to establish standing to challenge the PRISM program, even where he alleged that he “frequents and routinely telephones and e-mails

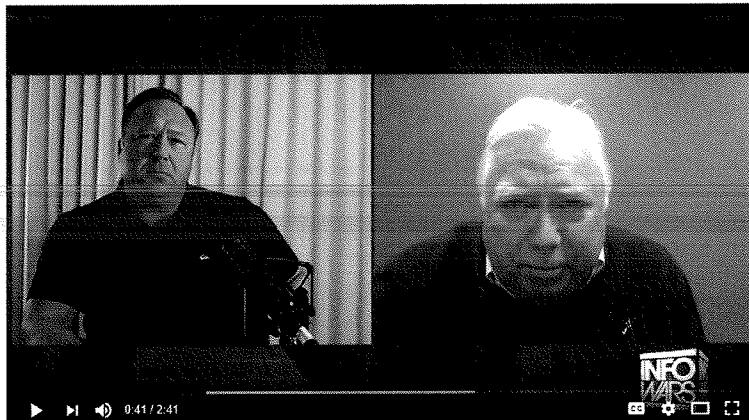


individuals and high-ranking government officials in Israel” and communicates with persons in several other nations). Plaintiffs accordingly lack standing to challenge defendants’ alleged surveillance under the PRISM program.

Second, plaintiffs claim that they, and millions of other Americans, have been targeted for surveillance by the bulk telephony metadata collection program formerly conducted by the NSA pursuant to Section 215 of the USA PATRIOT Act.

11. Jerome Corsi appeared on the Alex Jones INFOWARS social media podcast and advised the host that he was receiving communications “higher than Mossad”. See the video entitled, “*Alex Jones Deemed Kosher by "Top Israeli Intelligence"*”, Aug. 27, 2017 (see below).

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Alex Jones Deemed Kosher by "Top Israeli Intelligence"

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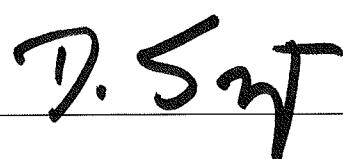
Published on Aug 12, 2017

Internet URL: <https://www.youtube.com/watch?v=jORe0zfEOX0>

00:21 CORSI. Well Alex its great, actually today I am in Nashville, Tennessee working with a really important cyber security company. And I just got a text from top intelligence in Israel.

12. The undersigned believes that the presiding judge must provide a written explanation as to how her honor plans to mitigate the apparent conflict of interest in hearing a lawsuit that involves a defendant so closely tied to the hate speech of ref: (a) as you.
13. I trust you will consider the foregoing information and support me with your non-opposition to a motion to disqualify the presiding judge.

Signed this 17 day of July, 2019.


D. G. SWEIGERT

7.19.19

C/O
P.O. BOX 152
MESA, AZ 85211

1 **D. GEORGE SWEIGERT, C/O**
2 **P.O. BOX 152**
3 **MESA, AZ 85211**

2019 JUL 23 PM 1:29

500 PELM N.Y.

4 **IN THE UNITED STATES DISTRICT COURT**
5 **FOR THE SOUTHERN DISTRICT OF NEW YORK**
6 **(FOLEY SQUARE)**

7 D. GEORGE SWEIGERT

Case No.: 1:18-cv-08653-UA

8 Plaintiff,

9 vs.

10 JASON GOODMAN

11 **CERTIFICATE OF SERVICE**

12 Defendant

14 **CERTIFICATE OF SERVICE**

15
16 The Plaintiff certifies under penalties of perjury that the enclosed documents have been
17 sent via First Class postage paid U.S. Mail to:

18
19 **Jason Goodman, CEO**
20 **Multimedia System Design, Inc.**
21 **252 7th Avenue #6S**
22 **New York, NY 10001**

20 **PRO SE DIVISION -- 200**
21 **Clerk of the Court**
22 **U.S. District Court for the SDNY**
23 **(FOLEY SQUARE)**
24 **500 Pearl Street**
25 **New York, New York 10007-1312**

26 Respectfully dated this day 19 July, 2019

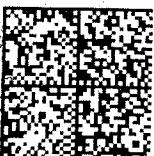
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D. G. SWEIGERT

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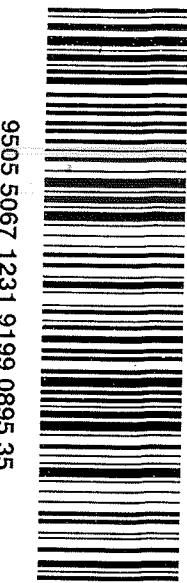
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D. GEORGE SWEIGERT, C/O
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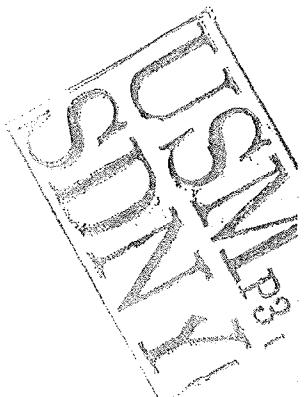
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